

Exhibit 3

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ETHEREUM VENTURES, LLC,

Plaintiff,

v.

CHET MINING CO LLC and CHET
STOJANOVICH,

Defendant.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/7/20

No. 1:19-cv-7949 (LLS)

**VENABLE LLP'S MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR
DEFENDANTS CHET MINING CO LLC AND CHET STOJANOVICH**

Pursuant to Rule 1.4 of the Local Civil Rules of the United States District Court for the Southern District of New York, the undersigned, on behalf of himself and the firm Venable LLP, hereby moves to withdraw as counsel of record for Defendants Chet Mining Co LLC and Chet Stojanovich (collectively, "Defendants").

In support of this motion, the undersigned states and affirms that:

- This case was initially filed in the Southern District of New York. *See* S.D.N.Y. No. 1:19-cv-7949 (LLS). Attorneys from Venable LLP appeared on behalf of Defendants.
- Defendants have failed to provide any payment to retain Venable LLP's counsel.
- This matter is in its earliest stages. Subsequent to the filing of the Complaint, Plaintiff and Defendants filed a joint stipulation proposing an order to extend Defendants' time to respond and/or answer Plaintiff's Complaint. *See* S.D.N.Y. No. 1:19-cv-7949 (LLS), Dkt. No. 10. On December 5, 2019, the Court entered a stipulation and order extending Defendants' time to respond and/or answer Plaintiff's Complaint from December 16, 2019 to December 23, 2019. *See* S.D.N.Y. No. 1:19-cv-7949 (LLS), Dkt. No. 11. On

December 23, 2019, Plaintiff and Defendants filed another joint stipulation proposing an order to extend Defendants' time to respond and/or answer Plaintiff's Complaint from December 23, 2019 to January 6, 2019. See S.D.N.Y. No. 1:19-cv-7949 (LLS), Dkt. No. 12.

- The Court did not take any action with respect to the pending stipulation and order to extend time.
- Venable LLP is not asserting a retainer or charging lien in this matter.

For these reasons, the parties and the Court will not be prejudiced by the withdrawal of the attorneys of Venable LLP as counsel for Defendants. Therefore, the undersigned respectfully requests that the Court to grant the motion for Venable LLP to withdraw as counsel of record for Defendants.

Dated: New York, New York
January 6, 2020

VENABLE LLP

By: /s/ Edmund M. O'Toole
Edmund M. O'Toole

VENABLE LLP
1270 Avenue of the Americas, 24th Floor
New York, New York 10020
Tel.: (212) 307-5500

SO ORDERED this 7th day of Feb, 2020:

Louis L. Stanton
United States District Judge

CERTIFICATE OF SERVICE

I, Edmund M. O'Toole, hereby certify that on January 6, 2020, I caused the foregoing Motion to Withdraw as Counsel of Record to be filed electronically and served on counsel of record via the Court's ECF system.

By: /s/ Edmund M. O'Toole
Edmund M. O'Toole

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ETHEREUM VENTURES, LLC,

Plaintiff,

v.

CHET MINING CO LLC and CHET
STOJANOVICH,

Defendants.
-----X

:
:
:
: Civil Action No.
: 1:19-cv-7949 (LLS)
:

AFFIRMATION OF SERVICE

I, Laya Varanasi, an attorney duly authorized to practice in the State of New York and not a party to this action, do hereby affirm under the penalty of perjury that, on January 7, 2020, I served a service copy of the attached Venable LLP's Motion to Withdraw as Counsel of Record for Defendants Chet Mining Co LLC and Chet Stojanovich upon:

Chet Stojanovich
105 Duane Street
New York, NY
10007

at the address designated by said Defendants for that purpose, by causing the attached documents, enclosed in a postage-paid, properly addressed wrapper, to be deposited a depository under the exclusive care and custody of Federal Express within the State of New York.

Dated: New York, New York
January 7, 2020

By: 

Laya Varanasi
VENABLE LLP
1270 Avenue of the Americas, 24th Floor
New York, New York 10020

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ETHEREUM VENTURES, LLC,

Plaintiff,

v.

CHET MINING CO LLC and CHET
STOJANOVICH,

Defendants.
-----X

Civil Action No.
1:19-cv-7949 (LLS)

AFFIRMATION OF SERVICE

I, Laya Varanasi, an attorney duly authorized to practice in the State of New York and not a party to this action, do hereby affirm under the penalty of perjury that, on January 9, 2020, Chet Stojanovich sent me the attached email confirming receipt of a service copy of the Venable LLP's Motion to Withdraw as Counsel of Record for Defendants Chet Mining Co LLC and Chet Stojanovich (ECF No. 17).

Dated: New York, New York
January 24, 2020

By: Laya Varanasi

Laya Varanasi
VENABLE LLP
1270 Avenue of the Americas, 24th Floor
New York, New York 10020

Varanasi, Laya

From: Chet Stojanovich <chet@chetminingco.com>
Sent: Thursday, January 9, 2020 1:51 AM
To: Wilson, D. Edward Jr.
Cc: O'Toole, Edmund M.; Varanasi, Laya
Subject: Re: Court documents: Withdrawal of Representation, Answer, and Corporate Disclosure Statement

Received, thank you. I got my deposit ready fyi. I heard from their lawyer that we had an issue,

Best Regards,

Chet Stojanovich
President & CEO

Chet Mining, LLC
26 Ottawa Avenue, Happy Valley-Goosebay
Newfoundland and Labrador A0P 1C0 Canada
t: 833.544.4826
m: 310.824.3903
e: chet@chetminingco.com
Skype: Chet.Stojanovich
Telegram: Chet11
To schedule a meeting: <https://calendly.com/chet-7>
www.chetminingco.com



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On Tue, Jan 7, 2020 at 2:02 PM Wilson, D. Edward Jr. <dewilsonjr@venable.com> wrote:

Chet,

I am really sorry to have had to do this, but we have now filed to withdraw from our representation of you and Chet Mining.

This document and others filed yesterday are attached below for your records.

You will need to find other counsel.

We wish you well.

Ed

Ed Wilson, Esq. | Venable LLP
t 202.344.4819 | f 202.344.8300 | m 703.395.8807
600 Massachusetts Avenue, NW, Washington, DC 20001

dewilsonjr@venable.com | www.Venable.com

From: [NYSD ECF Pool@nysd.uscourts.gov](mailto:NYSD_ECF_Pool@nysd.uscourts.gov) <[NYSD ECF Pool@nysd.uscourts.gov](mailto:NYSD_ECF_Pool@nysd.uscourts.gov)>

Date: Monday, Jan 06, 2020, 7:11 PM

To: CourtMail@nysd.uscourts.gov <CourtMail@nysd.uscourts.gov>

Subject: Activity in Case 1:19-cv-07949-LLS Ethereum Ventures, LLC v. Chet Mining Co, LLC et al Motion to Withdraw as Attorney

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U.S. District Court

Southern District of New York

Notice of Electronic Filing

The following transaction was entered by O'Toole, Edmund on 1/6/2020 at 7:10 PM EST and filed on 1/6/2020

Case Name: Ethereum Ventures, LLC v. Chet Mining Co, LLC et al
Case Number: 1:19-cv-07949-LLS
Filer: Chet Mining Co, LLC
Chet Stojanovich
Document Number: 16

Case 1:19-cv-07949-LLS Document 19 Filed 02/07/20 Page 8 of 10

Case 1:19-cv-07949-LLS Document 18 Filed 01/24/20 Page 4 of 6

Docket Text:

MOTION for Edmund M. O'Toole to Withdraw as Attorney . Document filed by Chet Mining Co, LLC, Chet Stojanovich.(O'Toole, Edmund)

1:19-cv-07949-LLS Notice has been electronically mailed to:

Edmund M. O'Toole emotoole@venable.com, nylitigationdocketing@venable.com

John Frederick Harwick jharwick@joneshacker.com, ddudley@joneshacker.com, diversen@joneshacker.com, djohnson@joneshacker.com, sfebus@joneshacker.com

1:19-cv-07949-LLS Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1008691343 [Date=1/6/2020] [FileNumber=23355217-0]
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9e72796bbf803225f9161deaa16b8fd2866959b36f4e19b000555db15ab36]]

From: [NYSD ECF Pool@nysd.uscourts.gov](mailto:NYSD_ECF_Pool@nysd.uscourts.gov) <[NYSD ECF Pool@nysd.uscourts.gov](mailto:NYSD_ECF_Pool@nysd.uscourts.gov)>

Date: Monday, Jan 06, 2020, 7:08 PM

To: CourtMail@nysd.uscourts.gov <CourtMail@nysd.uscourts.gov>

Subject: Activity in Case 1:19-cv-07949-LLS Ethereum Ventures, LLC v. Chet Mining Co, LLC et al Answer to Complaint

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U.S. District Court

Southern District of New York

Notice of Electronic Filing

Case 1:19-cv-07949-LLS Document 19 Filed 02/07/20 Page 9 of 10

Case 1:19-cv-07949-LLS Document 18 Filed 01/24/20 Page 5 of 6

The following transaction was entered by O'Toole, Edmund on 1/6/2020 at 7:07 PM EST and filed on 1/6/2020

Case Name: Ethereum Ventures, LLC v. Chet Mining Co, LLC et al

Case Number: 1:19-cv-07949-LLS

Filer: Chet Mining Co, LLC
Chet Stojanovich

Document Number: 15

Docket Text:

ANSWER to [1] Complaint,. Document filed by Chet Mining Co, LLC, Chet Stojanovich.(O'Toole, Edmund)

1:19-cv-07949-LLS Notice has been electronically mailed to:

Edmund M. O'Toole emotoole@venable.com, nylitigationdocketing@venable.com

John Frederick Harwick jharwick@joneshacker.com, ddudley@joneshacker.com, diversen@joneshacker.com,
djohnson@joneshacker.com, sfebus@joneshacker.com

1:19-cv-07949-LLS Notice has been delivered by other means to:

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Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1008691343 [Date=1/6/2020] [FileNumber=23355193-0
] [743b0f12e9aaae688dc14b1c7654859ca25d3f9a1a475b5305617835ea106e7c795
0a00e4c5bb58ed9dc51c32395f26307370edb32632cdc0a824c04f274eca6]]

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Date: Monday, Jan 06, 2020, 7:05 PM

To: CourtMail@nysd.uscourts.gov <CourtMail@nysd.uscourts.gov>

Subject: Activity in Case 1:19-cv-07949-LLS Ethereum Ventures, LLC v. Chet Mining Co, LLC et al Rule 7.1 Corporate Disclosure Statement

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U.S. District Court

Southern District of New York

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Case Name: Ethereum Ventures, LLC v. Chet Mining Co, LLC et al
Case Number: 1:19-cv-07949-LLS
Filer: Chet Mining Co, LLC
Document Number: 14

Docket Text:

RULE 7.1 CORPORATE DISCLOSURE STATEMENT. No Corporate Parent. Document filed by Chet Mining Co, LLC.(O'Toole, Edmund)

1:19-cv-07949-LLS Notice has been electronically mailed to:

Edmund M. O'Toole emotoole@venable.com, nylitigationdocketing@venable.com

John Frederick Harwick jharwick@joneshacker.com, ddudley@joneshacker.com, diversen@joneshacker.com,
djohnson@joneshacker.com, sfebus@joneshacker.com

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Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1008691343 [Date=1/6/2020] [FileNumber=23355181-0
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d6f5cc940438636716e9e004301a69d56a93e21ffc7643522eb57da1fc3b5]]

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